

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

THE GENERAL HOSPITAL
CORPORATION and DANA-FARBER
CANCER INSTITUTE, INC.,

Plaintiffs,

v.

ESOTERIX GENETIC LABORATORIES,
LLC and LABORATORY CORPORATION
OF AMERICA,

Defendants.

CIVIL ACTION NO:

**DECLARATION OF KELLIE WATSON IN SUPPORT
OF DEFENDANTS' NOTICE OF REMOVAL OF ACTION**

I, Kellie Watson, Ph.D., declare as follows:

1. I am the Head of Licensing, Corporate Development, for Laboratory Corporation of America Holdings, incorrectly identified in the Complaint as Laboratory Corporation of America ("LabCorp"). I make this declaration in support of Defendants Esoterix Genetic Laboratories, LLC ("EGL") and LabCorp's application to remove this Action to federal court.

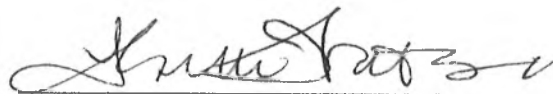
2. As Head of Licensing for LabCorp's Corporate Development, I am responsible for managing various license agreements on behalf of LabCorp and EGL. As relevant here, I am responsible for managing the May 2, 2005 Exclusive License Agreement between Plaintiff The General Hospital Corporation ("MGH"), Plaintiff Dana-Farber Cancer Institute, Inc. ("DFCI"), and EGL (the "License Agreement").

3. In preparing this declaration, I have relied upon my personal knowledge of EGL and LabCorp's business, as well as my review of EGL and LabCorp's business records, some of which are maintained under my supervision and control and other which are maintained under the supervision of other employees of EGL and/or LabCorp.

4. Specifically, I reviewed EGL and LabCorp's records for the reporting period ending June 30, 2017. If EGL and LabCorp were obligated to pay royalties to MGH and DFCI for the entire reporting period ending June 30, 2017, this amount would well exceed \$75,000.

I declare under penalty of perjury under the laws of the State of Massachusetts that the foregoing is true and correct.

Executed on June 26, 2018 at Westborough, MA.


Kellie Watson, Ph.D.